

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

(18)

4-12-01

JOHN RICHARD JAE,

Plaintiff,

vs.

SUPERINTENDENT DRAGONICH, et al.,

Defendants.

ORIGINAL

PI No - 1-CK-00-2123

U.S. District Judge Ramb

Magistrate Judge Smyse

FILED

APR 11 2001

MOTION FOR ENLARGEMENT OF TIME

Pursuant to Fed. R. Civ. P. 6(b), Plaintiff ~~has~~ ^{has} secured permission to make this court for an enlargement of time in which to file his Reply Brief in opposition to Defendants' Motion to Dismiss the Complaint, herein, & who, aver, deposes & states in support thereof as follows:

1. Due to the facts that Plaintiff needs to have copies made of the ~~appendix~~ ^{appendix} to his Reply Brief in opposition to Defendants' Motion to Dismiss the Complaint, herein, but he is totally financially indigent with no money at to pay for the photo copies of such the Prison does "not" provide free photocopying, the Plaintiff send such out to his Christian Friend for photocopying of said Plaintiff's Christian Friend is presently over in Africa on a mission trip and will not return back to the States until May 1, 2001. It will need at least 6 weeks to get these photo copies made and returned back here to this Plaintiff, & that, Plaintiff is confined in the Special Management Unit here & the Prison severely limits the amount of time & hours which the Plaintiff can go to use the prison law library (only once a month for two (2) hours). Plaintiff is unable to file & serve Reply Brief in opposition to Defendants' Motion to Dismiss the Complaint present due date for such of April 6, 2001, & thus he requests an enlargement of time of forty-five (45) days from this date in which to file & serve Reply Brief in opposition to Defendants' Motion to Dismiss the Complaint and Appendix, herein this case.

RESPECTFULLY SUBMITTED

(9)

John Richard Jae
MR. JOHN RICHARD JAE
#24-2419
SCI-GREENE/SMU
175 PROGRESS DRIVE
WAYNESBURG, PA. 15370

Dated: 5th APRIL 2001

Jae vs. Dragovich, et al
CIVIL No. 1:00-CV-00-0123
CERTIFICATE OF SERVICE

I Certify that on 4-06-01, I mailed to the person listed below a true & correct carbon copy of the within Plaintiff's Motion for Enlargement of Time, by First-Class U.S. Mail, Postage Prepaid addressed to:

MR. Michael L. Harvey
Senior Deputy Attorney General
Office of the Attorney General
of Pennsylvania
1st Floor, Strawberry Square
Harrisburg, PA 17120

I Certify that on 4-06-01, I gave the original of the above same to PRISON OFFICIALS here for mailing to this court.

I Certify under penalty of perjury & pursuant to 28 U.S.C. § 1746 that the above is true & correct.

Dated/Executed on:
6th APRIL 2001
At Waynesburg, Pennsylvania

(s) John Richard
MR. JOHN RICHARD G
#BA-3219
SCI-Greene/SMU
175 Progress Drive
Waynesburg, PA 15370
Plaintiff and PR Sec